

# FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO  
Afton Chemical Corporation

AUTHORIZING THE OPERATION OF  
Afton Lube and Fuel Additives Plant  
Lube and Fuel Additives Plant  
All Other Basic Organic Chemical Manufacturing

LOCATED AT  
Harris County, Texas  
Latitude 29° 44' 4" Longitude 95° 10' 17"  
Regulated Entity Number: RN101613230

This permit is issued in accordance with and subject to the Texas Clean Air Act (TCAA), Chapter 382 of the Texas Health and Safety Code and Title 30 Texas Administrative Code Chapter 122 (30 TAC Chapter 122), Federal Operating Permits. Under 30 TAC Chapter 122, this permit constitutes the permit holder's authority to operate the site and emission units listed in this permit. Operations of the site and emission units listed in this permit are subject to all additional rules or amended rules and orders of the Commission pursuant to the TCAA.

This permit does not relieve the permit holder from the responsibility of obtaining New Source Review authorization for new, modified, or existing facilities in accordance with 30 TAC Chapter 116, Control of Air Pollution by Permits for New Construction or Modification.

The site and emission units authorized by this permit shall be operated in accordance with 30 TAC Chapter 122, the general terms and conditions, special terms and conditions, and attachments contained herein.

This permit shall expire five years from the date of issuance. The renewal requirements specified in 30 TAC § 122.241 must be satisfied in order to renew the authorization to operate the site and emission units.

Permit No:       O1460       Issuance Date: \_\_\_\_\_

\_\_\_\_\_  
For the Commission

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## **General Terms and Conditions**

The permit holder shall comply with all terms and conditions contained in 30 TAC § 122.143 (General Terms and Conditions), 30 TAC § 122.144 (Recordkeeping Terms and Conditions), 30 TAC § 122.145 (Reporting Terms and Conditions), and 30 TAC § 122.146 (Compliance Certification Terms and Conditions).

In accordance with 30 TAC § 122.144(1), records of required monitoring data and support information required by this permit, or any applicable requirement codified in this permit, are required to be maintained for a period of five years from the date of the monitoring report, sample, or application unless a longer data retention period is specified in an applicable requirement. The five year record retention period supersedes any less stringent retention requirement that may be specified in a condition of a permit identified in the New Source Review Authorization attachment.

If the permit holder chooses to demonstrate that this permit is no longer required, a written request to void this permit shall be submitted to the Texas Commission on Environmental Quality (TCEQ) by the Responsible Official in accordance with 30 TAC § 122.161(e). The permit holder shall comply with the permit's requirements, including compliance certification and deviation reporting, until notified by the TCEQ that this permit is voided.

The permit holder shall comply with 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit.

All reports required by this permit must include in the submittal a cover letter which identifies the following information: company name, TCEQ regulated entity number, air account number (if assigned), site name, area name (if applicable), and Air Permits Division permit number(s).

## **Special Terms and Conditions:**

### **Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting**

1. Permit holder shall comply with the following requirements:
  - A. Emission units (including groups and processes) in the Applicable Requirements Summary attachment shall meet the limitations, standards, equipment specifications, monitoring, recordkeeping, reporting, testing, and other requirements listed in the Applicable Requirements Summary attachment to assure compliance with the permit.
  - B. The textual description in the column titled "Textual Description" in the Applicable Requirements Summary attachment is not enforceable and is not deemed as a substitute for the actual regulatory language. The Textual Description is provided for information purposes only.
  - C. A citation listed on the Applicable Requirements Summary attachment, which has a notation [G] listed before it, shall include the referenced section and subsection for all commission rules, or paragraphs for all federal and state regulations and all subordinate paragraphs, subparagraphs and clauses, subclauses, and items contained within the referenced citation as applicable requirements.
  - D. When a grouped citation, notated with a [G] in the Applicable Requirements Summary, contains multiple compliance options, the permit holder must keep records of when each compliance option was used.
2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):

- A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
  - B. Title 30 TAC § 101.3 (relating to Circumvention)
  - C. Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
  - D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ
  - E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
  - F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
  - G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
  - H. Title 30 TAC § 101.221 (relating to Operational Requirements)
  - I. Title 30 TAC § 101.222 (relating to Demonstrations)
  - J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)
3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:
- A. Visible emissions from stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed after January 31, 1972 that are not listed in the Applicable Requirements Summary attachment for 30 TAC Chapter 111, Subchapter A, Division 1, shall not exceed 20% opacity averaged over a six-minute period. The permit holder shall comply with the following requirements for stationary vents at the site subject to this standard:
    - (i) Title 30 TAC § 111.111(a)(1)(B) (relating to Requirements for Specified Sources)
    - (ii) Title 30 TAC § 111.111(a)(1)(E)
    - (iii) Title 30 TAC § 111.111(a)(1)(F)(i), (ii), (iii), or (iv)
    - (iv) For emission units with vent emissions subject to 30 TAC § 111.111(a)(1)(B), complying with 30 TAC § 111.111(a)(1)(F)(ii), (iii), or (iv), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO<sub>x</sub>, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146. These periodic monitoring requirements do not apply to vents that are not capable of producing visible emissions such as vents that emit only colorless VOCs; vents from non-fuming liquids; vents that provide passive ventilation, such as plumbing vents; or vent emissions from any other source that does not obstruct the transmission of light. Vents, as specified in the "Applicable Requirements Summary" attachment, that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) are not subject to the following periodic monitoring requirements:

- (1) An observation of stationary vents from emission units in operation shall be conducted at least once during each calendar quarter unless the emission unit is not operating for the entire quarter.
- (2) For stationary vents from a combustion source, if an alternative to the normally fired fuel is fired for a period greater than or equal to 24 consecutive hours, the permit holder shall conduct an observation of the stationary vent for each such period to determine if visible emissions are present. If such period is greater than 3 months, observations shall be conducted once during each quarter. Supplementing the normally fired fuel with natural gas or fuel gas to increase the net heating value to the minimum required value does not constitute creation of an alternative fuel.
- (3) Records of all observations shall be maintained.
- (4) Visible emissions observations of emission units operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of emission units operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions observations shall be made during times when the activities described in 30 TAC § 111.111(a)(1)(E) are not taking place. Visible emissions shall be determined with each stationary vent in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each stationary vent during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.
- (5) Compliance Certification:
  - (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(1) and (a)(1)(B).
  - (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(1)(F) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as

required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.

- (c) Some vents may be subject to multiple visible emission or monitoring requirements. All credible data must be considered when certifying compliance with this requirement even if the observation or monitoring was performed to demonstrate compliance with a different requirement.

B. For visible emissions from a building, enclosed facility, or other structure; the permit holder shall comply with the following requirements:

- (i) Title 30 TAC § 111.111(a)(7)(A) (relating to Requirements for Specified Sources)
- (ii) Title 30 TAC § 111.111(a)(7)(B)(i) or (ii)
- (iii) For a building containing an air emission source, enclosed facility, or other structure containing or associated with an air emission source subject to 30 TAC § 111.111(a)(7)(A), complying with 30 TAC § 111.111(a)(7)(B)(i) or (ii), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO<sub>x</sub>, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146:
  - (1) An observation of visible emissions from a building containing an air emission source, enclosed facility, or other structure containing or associated with an air emission source which is required to comply with 30 TAC § 111.111(a)(7)(A) shall be conducted at least once during each calendar quarter unless the air emission source or enclosed facility is not operating for the entire quarter.
  - (2) Records of all observations shall be maintained.
  - (3) Visible emissions observations of air emission sources or enclosed facilities operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of air emission sources or enclosed facilities operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions shall be determined with each emissions outlet in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each emissions outlet during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.
  - (4) Compliance Certification:

- (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(7) and (a)(7)(A).
  - (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(7)(B) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.
- C. Certification of opacity readers determining opacities under Method 9 (as outlined in 40 CFR Part 60, Appendix A) to comply with opacity monitoring requirements shall be accomplished by completing the Visible Emissions Evaluators Course, or approved agency equivalent, no more than 180 days before the opacity reading.
- D. For emission units with contributions from uncombined water, the permit holder shall comply with the requirements of 30 TAC § 111.111(b).
- E. Permit holders for sites that have materials handling, construction, roads, streets, alleys, and parking lots shall comply with the following requirements:
  - (i) Title 30 TAC § 111.143 (relating to Materials Handling)
  - (ii) Title 30 TAC § 111.145 (relating to Construction and Demolition)
  - (iii) Title 30 TAC § 111.147 (relating to Roads, Streets, and Alleys)
  - (iv) Title 30 TAC § 111.149 (relating to Parking Lots)
- F. Emission limits on nonagricultural processes, except for the steam generators specified in 30 TAC § 111.153, shall comply with the following requirements:
  - (i) Emissions of PM from any source may not exceed the allowable rates as required in 30 TAC § 111.151(a) (relating to Allowable Emissions Limits)
  - (ii) Sources with an effective stack height ( $h_e$ ) less than the standard effective stack height ( $H_e$ ), must reduce the allowable emission level by multiplying it by  $[h_e/H_e]^2$  as required in 30 TAC § 111.151(b)
  - (iii) Effective stack height shall be calculated by the equation specified in 30 TAC § 111.151(c)
- G. Outdoor burning, as stated in 30 TAC § 111.201, shall not be authorized unless the following requirements are satisfied:

- (i) Title 30 TAC § 111.205 (relating to Exception for Fire Training)
  - (ii) Title 30 TAC § 111.207 (relating to Exception for Recreation, Ceremony, Cooking, and Warmth)
  - (iii) Title 30 TAC § 111.219 (relating to General Requirements for Allowable Outdoor Burning)
  - (iv) Title 30 TAC § 111.221 (relating to Responsibility for Consequences of Outdoor Burning)
- 4. For storage vessels maintaining working pressure as specified in 30 TAC Chapter 115, Subchapter B, Division 1: Storage of Volatile Organic Compounds, the permit holder shall comply with the requirements of 30 TAC § 115.112(e)(1).
- 5. For industrial wastewater specified in 30 TAC Chapter 115, Subchapter B, the permit holder shall comply with the following requirements:
  - A. Title 30 TAC § 115.145 (relating to Approved Test Methods)
  - B. Title 30 TAC § 115.146 (relating to Recordkeeping Requirements)
  - C. Title 30 TAC § 115.147(1) (relating to Exemptions)
  - D. Title 30 TAC § 115.148 (relating to Determination of Wastewater Characteristics)
- 6. Permit holder shall comply with the following 30 TAC Chapter 115, Subchapter C requirements:
  - A. When filling stationary gasoline storage vessels (Stage I) for motor vehicle fuel dispensing facilities specified in 30 TAC Chapter 115, Subchapter C, the permit holder shall comply with the following requirements:
    - (i) Title 30 TAC § 115.221 (relating to Emission Specifications)
    - (ii) Title 30 TAC § 115.222 (relating to Control Requirements)
    - (iii) Title 30 TAC § 115.223 (relating to Alternate Control Requirements)
    - (iv) Title 30 TAC § 115.224 (relating to Inspection Requirements)
    - (v) Title 30 TAC § 115.225 (relating to Testing Requirements)
    - (vi) Title 30 TAC § 115.226 (relating to Recordkeeping Requirements)
- 7. The permit holder shall comply with the following 30 TAC Chapter 115, Subchapter F requirements (relating to Cutback Asphalt Requirements):
  - A. Title 30 TAC § 115.512(1) (relating to Control Requirements)
  - B. Title 30 TAC § 115.512(2) (relating to Control Requirements)
  - C. Title 30 TAC § 115.512(3) (relating to Control Requirements)
  - D. Title 30 TAC § 115.515 (relating to Testing Requirements)



8. The permit holder shall comply with the following requirements of 30 TAC Chapter 117:
  - A. For boilers, process heaters, stationary reciprocating engines, and turbines (including duct burners) subject to Subchapter D, Division 1 at minor sources of NO<sub>x</sub>:
    - (i) Title 30 TAC § 117.2010(b), and (c) - (h) (relating to Emission Specifications), for sources not subject to mass emissions cap and trade under 30 TAC Chapter 101, Subchapter H
    - (ii) Title 30 TAC § 117.2030 (relating to Operating Requirements)
    - (iii) Title 30 TAC § 117.2035 (relating to Monitoring and Testing Requirements)
    - (iv) Title 30 TAC § 117.2045 (relating to Recordkeeping and Reporting Requirements)
    - (v) Title 30 TAC § 117.9200 (relating to Compliance Schedule)
  - B. For boilers, process heaters, stationary reciprocating engines, and turbines (including duct burners) exempt from Subchapter D, Division 1 at minor sources of NO<sub>x</sub> under 30 TAC § 117.2003(a), the permit holder shall comply with 30 TAC §§ 117.2030(c), 117.2035(g), 117.2045(b) and 117.2045(c).
9. The permit holder shall comply with the following requirements for units subject to any subpart of 40 CFR Part 60, unless otherwise stated in the applicable subpart:
  - A. Title 40 CFR § 60.7 (relating to Notification and Recordkeeping)
  - B. Title 40 CFR § 60.8 (relating to Performance Tests)
  - C. Title 40 CFR § 60.11 (relating to Compliance with Standards and Maintenance Requirements)
  - D. Title 40 CFR § 60.12 (relating to Circumvention)
  - E. Title 40 CFR § 60.13 (relating to Monitoring Requirements)
  - F. Title 40 CFR § 60.14 (relating to Modification)
  - G. Title 40 CFR § 60.15 (relating to Reconstruction)
  - H. Title 40 CFR § 60.19 (relating to General Notification and Reporting Requirements)
10. The permit holder shall comply with the following requirements for units subject to any subpart of 40 CFR Part 61, unless otherwise stated in the applicable subpart:
  - A. Title 40 CFR § 61.05 (relating to Prohibited Activities)
  - B. Title 40 CFR § 61.07 (relating to Application for Approval of Construction or Modification)
  - C. Title 40 CFR § 61.09 (relating to Notification of Start-up)
  - D. Title 40 CFR § 61.10 (relating to Source Reporting and Request Waiver)

- E. Title 40 CFR § 61.12 (relating to Compliance with Standards and Maintenance Requirements)
  - F. Title 40 CFR § 61.13 (relating to Emissions Tests and Waiver of Emission Tests)
  - G. Title 40 CFR § 61.14 (relating to Monitoring Requirements)
  - H. Title 40 CFR § 61.15 (relating to Modification)
  - I. Title 40 CFR § 61.19 (relating to Circumvention)
11. The permit holder shall comply with the requirements of 30 TAC Chapter 113, Subchapter C, § 113.100 for units subject to any subpart of 40 CFR Part 63, unless otherwise stated in the applicable subpart.
  12. For each gasoline dispensing facility, with a throughput of less than 10,000 gallons per month as specified in 40 CFR Part 63, Subpart CCCCCC, the permit holder shall comply with the following requirements (Title 30 TAC, Subchapter C, § 113.1380 incorporated by reference):
    - A. Title 40 CFR § 63.11111(e), for records of monthly throughput
    - B. Title 40 CFR § 63.11111(i), for compliance due to increase of throughput
    - C. Title 40 CFR § 63.11113(c), for compliance due to increase of throughput
    - D. Title 40 CFR § 63.11115(a), for operation of the source
    - E. Title 40 CFR § 63.11116(a) and (a)(1) - (4), for work practices
    - F. Title 40 CFR § 63.11116(b), for records availability
    - G. Title 40 CFR § 63.11116(d), for portable gasoline containers

#### **Additional Monitoring Requirements**

13. The permit holder shall comply with the periodic monitoring requirements as specified in the attached "Periodic Monitoring Summary" upon issuance of the permit. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permit holder shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. The permit holder may elect to collect monitoring data on a more frequent basis and average the data, consistent with the averaging time or minimum frequency specified in the "Periodic Monitoring Summary," for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis. In no event shall data be collected and used in particular instances to avoid reporting deviations. Deviations shall be reported according to 30 TAC § 122.145 (Reporting Terms and Conditions).

#### **New Source Review Authorization Requirements**

14. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule, standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under

30 TAC Chapter 116, Subchapter I, or special exemptions referenced in the New Source Review Authorization References attachment. These requirements:

- A. Are incorporated by reference into this permit as applicable requirements
  - B. Shall be located with this operating permit
  - C. Are not eligible for a permit shield
15. The permit holder shall comply with the general requirements of 30 TAC Chapter 106, Subchapter A or the general requirements, if any, in effect at the time of the claim of any PBR.
16. The permit holder shall maintain records to demonstrate compliance with any emission limitation or standard that is specified in a permit by rule (PBR) or Standard Permit listed in the New Source Review Authorizations attachment. The records shall yield reliable data from the relevant time period that are representative of the emission unit's compliance with the PBR or Standard Permit. These records may include, but are not limited to, production capacity and throughput, hours of operation, safety data sheets (SDS), chemical composition of raw materials, speciation of air contaminant data, engineering calculations, maintenance records, fugitive data, performance tests, capture/control device efficiencies, direct pollutant monitoring (CEMS, COMS, or PEMS), or control device parametric monitoring. These records shall be made readily accessible and available as required by 30 TAC § 122.144. Any monitoring or recordkeeping data indicating noncompliance with the PBR or Standard Permit shall be considered and reported as a deviation according to 30 TAC § 122.145 (Reporting Terms and Conditions).

#### **Compliance Requirements**

17. The permit holder shall certify compliance in accordance with 30 TAC § 122.146. The permit holder shall comply with 30 TAC § 122.146 using at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information. The certification period may not exceed 12 months and the certification must be submitted within 30 days after the end of the period being certified.
18. The permit holder shall adhere to the provisions in the Compliance Schedule attachment of this permit and submit certified progress reports consistent with the schedule established under 30 TAC § 122.132(d)(4)(C) and including the information specified in 30 TAC § 122.142(d)(2). Those emission units listed in the Compliance Schedule attachment shall adhere with the requirements in the Compliance Schedule attachment until operating fully in compliance with the applicable requirements.
19. Use of Emission Credits to comply with applicable requirements:
- A. Unless otherwise prohibited, the permit holder may use emission credits to comply with the following applicable requirements listed elsewhere in this permit:
    - (i) Title 30 TAC Chapter 115
    - (ii) Title 30 TAC Chapter 117
    - (iii) Offsets for Title 30 TAC Chapter 116
  - B. The permit holder shall comply with the following requirements in order to use the emission credits to comply with the applicable requirements:

- (i) The permit holder must notify the TCEQ according to 30 TAC § 101.306(c)-(d)
- (ii) The emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 1
- (iii) The executive director has approved the use of the credit according to 30 TAC § 101.306(c)-(d)
- (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.302(g) and 30 TAC Chapter 122
- (v) Title 30 TAC § 101.305 (relating to Emission Reductions Achieved Outside the United States)

20. Use of Discrete Emission Credits to comply with the applicable requirements:

- A. Unless otherwise prohibited, the permit holder may use discrete emission credits to comply with the following applicable requirements listed elsewhere in this permit:
  - (i) Title 30 TAC Chapter 115
  - (ii) Title 30 TAC Chapter 117
  - (iii) If applicable, offsets for Title 30 TAC Chapter 116
  - (iv) Temporarily exceed state NSR permit allowables
- B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:
  - (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
  - (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
  - (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
  - (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122
  - (v) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)

## **Risk Management Plan**

- 21. For processes subject to 40 CFR Part 68 and specified in 40 CFR § 68.10, the permit holder shall comply with the requirements of the Accidental Release Prevention Provisions in 40 CFR Part 68. The permit holder shall submit to the appropriate agency either a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR § 68.10(a), or as part of the compliance certification submitted under this permit, a certification statement that the

source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of a risk management plan.

### **Protection of Stratospheric Ozone**

22. Permit holders at a site subject to Title VI of the FCAA Amendments shall meet the following requirements for protection of stratospheric ozone:
- A. Any on site servicing, maintenance, and repair on refrigeration and nonmotor vehicle air-conditioning appliances using ozone-depleting refrigerants or non-exempt substitutes shall be conducted in accordance with 40 CFR Part 82, Subpart F. Permit holders shall ensure that repairs on or refrigerant removal from refrigeration and nonmotor vehicle air-conditioning appliances using ozone-depleting refrigerants are performed only by properly certified technicians using certified equipment. Records shall be maintained as required by 40 CFR Part 82, Subpart F.
  - B. Any on site servicing, maintenance, and repair of fleet vehicle air conditioning using ozone-depleting refrigerants shall be conducted in accordance with 40 CFR Part 82, Subpart B. Permit holders shall ensure that repairs or refrigerant removal are performed only by properly certified technicians using certified equipment. Records shall be maintained as required by 40 CFR Part 82, Subpart B.
  - C. The permit holder shall comply with 40 CFR Part 82, Subpart F related to the disposal requirements for appliances using Class I or Class II (ozone-depleting) substances or non-exempt substitutes as specified in 40 CFR §§ 82.150 - 82.166 and the applicable Part 82 Appendices.

### **Permit Location**

23. The permit holder shall maintain a copy of this permit and records related to requirements listed in this permit on site.

### **Permit Shield (30 TAC § 122.148)**

24. A permit shield is granted for the emission units, groups, or processes specified in the attached "Permit Shield." Compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements listed in the attachment "Permit Shield." Permit shield provisions shall not be modified by the executive director until notification is provided to the permit holder. No later than 90 days after notification of a change in a determination made by the executive director, the permit holder shall apply for the appropriate permit revision to reflect the new determination. Provisional terms are not eligible for this permit shield. Any term or condition, under a permit shield, shall not be protected by the permit shield if it is replaced by a provisional term or condition or the basis of the term and condition changes.

## **Attachments**

**Applicable Requirements Summary**

**Additional Monitoring Requirements**

**Permit Shield**

**New Source Review Authorization References**

**Schedules**

### **Applicable Requirements Summary**

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Note: A “none” entry may be noted for some emission sources in this permit’s “Applicable Requirements Summary” under the heading of “Monitoring and Testing Requirements” and/or “Recordkeeping Requirements” and/or “Reporting Requirements.” Such a notation indicates that there are no requirements for the indicated emission source as identified under the respective column heading(s) for the stated portion of the regulation when the emission source is operating under the conditions of the specified SOP Index Number. However, other relevant requirements pursuant to 30 TAC Chapter 122 including Recordkeeping Terms and Conditions (30 TAC § 122.144), Reporting Terms and Conditions (30 TAC § 122.145), and Compliance Certification Terms and Conditions (30 TAC § 122.146) continue to apply.

### Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
ADDITPLANT	CHEMICAL MANUFACTURING PROCESS	N/A	R5160	30 TAC Chapter 115, Batch Processes	No changing attributes.
GRPLOAD	LOADING/UNLOADING OPERATIONS	X-A-0, X-A-1, X-A-10, X-A-11, X-A-12, X-A-13, X-A-14, X-A-15, X-A-16, X-A-17, X-A-18, X-A-19, X-A-2, X-A-20, X-A-25, X-A-4, X-A-5, X-A-6, X-A-7, X-A-8, X-A-9	R5211	30 TAC Chapter 115, Loading and Unloading of VOC	No changing attributes.
GRPTANK1	STORAGE TANKS/VESSELS	TOTE1, TOTE2, TOTE3, TOTE4, X-G-13, X-G-14, X-G-15, X-G-17, X-G-18, X-G-32, X-H-3, X-H-6, X-H-7, X-H-8, X-I-5, X-I-9, X-PD-4	R5112	30 TAC Chapter 115, Storage of VOCs	No changing attributes.
GRPTANK2	STORAGE TANKS/VESSELS	X-G-29, X-G-4, X-I-14, X-J-18, X-J-19, X-J-31, X-J-32	R5112	30 TAC Chapter 115, Storage of VOCs	No changing attributes.
GRPTANK3	STORAGE TANKS/VESSELS	X-G-11, X-I-13	R5112	30 TAC Chapter 115, Storage of VOCs	No changing attributes.
GRPTANK4	STORAGE TANKS/VESSELS	X-G-19, X-G-3, X-G-5, X-G-6, X-H-1, X-H-13, X-H-14, X-H-2, X-I-0, X-I-1, X-I-2, X-J-24, X-J-25, X-J-26	R5112	30 TAC Chapter 115, Storage of VOCs	No changing attributes.
GRPTANK5	STORAGE TANKS/VESSELS	X-G-0, X-G-1, X-G-12, X-G-16, X-G-20,	R5112	30 TAC Chapter 115, Storage of VOCs	No changing attributes.



### Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
		X-G-21, X-G-22, X-G-23, X-G-24, X-G-25, X-G-26, X-G-28, X-G-31, X-G-36, X-G-7, X-G-8, X-G-9, X-H-0, X-H-11, X-H-12, X-H-16, X-H-17, X-H-18, X-H-4, X-H-5, X-H-9, X-I-8, X-J-1, X-J-10, X-J-12, X-J-13, X-J-14, X-J-16, X-J-17, X-J-2, X-J-20, X-J-27, X-J-28, X-J-29, X-J-3, X-J-30, X-J-4, X-J-5, X-J-6, X-J-8, X-J-9			
GRP-VENT	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	C-1401, C-1407, C-1423, C-1424, C-1602, D-1150, D-1212, D-1420, D-1613, D-1624, D-1625, R-1112, R-1120, R-1150, R-1210, R-1214, R-1228	R5121	30 TAC Chapter 115, Vent Gas Controls	No changing attributes.
X-D-1	FLARES	N/A	R1111	30 TAC Chapter 111, Visible Emissions	No changing attributes.
X-D-1	FLARES	N/A	60A	40 CFR Part 60, Subpart A	No changing attributes.
X-E-1	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	N/A	R5121	30 TAC Chapter 115, Vent Gas Controls	No changing attributes.
X-E-2	EMISSION	N/A	R5121	30 TAC Chapter 115, Vent	No changing attributes.

### Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
	POINTS/STATIONARY VENTS/PROCESS VENTS			Gas Controls	
X-E-3	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	N/A	R5121	30 TAC Chapter 115, Vent Gas Controls	No changing attributes.
X-E-4	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	N/A	R5121-1	30 TAC Chapter 115, Vent Gas Controls	Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg)., VOC Concentration = VOC concentration is greater than or equal to 612 ppmv.
X-E-4	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	N/A	R5121-2	30 TAC Chapter 115, Vent Gas Controls	Combined 24-Hour VOC Weight = Combined VOC weight is greater than 100 pounds (45.4 kg)., VOC Concentration = VOC concentration is less than 612 ppmv.
X-G-34	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	N/A	R1111	30 TAC Chapter 111, Visible Emissions	No changing attributes.
X-I-12	STORAGE TANKS/VESSELS	N/A	R5112	30 TAC Chapter 115, Storage of VOCs	No changing attributes.
X-I-15	STORAGE TANKS/VESSELS	N/A	R5112	30 TAC Chapter 115, Storage of VOCs	No changing attributes.
X-I-16	STORAGE TANKS/VESSELS	N/A	R5112	30 TAC Chapter 115, Storage of VOCs	No changing attributes.
X-I-6	STORAGE TANKS/VESSELS	N/A	R5112	30 TAC Chapter 115, Storage of VOCs	No changing attributes.
X-I-7	STORAGE TANKS/VESSELS	N/A	R5112	30 TAC Chapter 115, Storage of VOCs	No changing attributes.
X-J-11	STORAGE	N/A	R5112	30 TAC Chapter 115,	No changing attributes.

### Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
	TANKS/VESSELS			Storage of VOCs	
X-J-15	STORAGE TANKS/VESSELS	N/A	R5112	30 TAC Chapter 115, Storage of VOCs	No changing attributes.
X-J-15	STORAGE TANKS/VESSELS	N/A	60KB	40 CFR Part 60, Subpart Kb	No changing attributes.

### Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
ADDITPLAN T	PRO	R5160	VOC	30 TAC Chapter 115, Batch Processes	§ 115.167(2) § 115.162(3)	Combined vents from a batch process train or single unit operations that meet the criteria in § 115.162(2)(A) or (B), respectively, are exempt from the requirements of this division, except for §§115.161(b) and (C), 115.164, and 115.166(2).	§ 115.164(1) § 115.164(2) § 115.166 [G]§ 115.166(2)	§ 115.166 [G]§ 115.166(2)	None
ADDITPLAN T	PRO	R5160	VOC	30 TAC Chapter 115, Batch Processes	§ 115.162(1) § 115.162(1)(A) § 115.162(1)(B) § 115.162(1)(C) § 115.162(2) § 115.162(2)(C) § 115.162(2)(D) § 115.162(2)(E) [G]§ 115.162(2)(F) § 60.18(b)	The mass emission rate from individual process vents or for process vent streams in aggregate within a batch process shall be reduced by 90% if the actual average flow rate value is below the flow rate value calculated using the applicable RACT equation.	§ 115.164(1) § 115.164(2) § 115.165(2)(C)(i) § 115.165(2)(C)(iii) § 115.165(2)(D) § 115.165(2)(E) § 115.166 § 115.166(1) § 115.166(1)(B) [G]§ 115.166(2) § 115.166(3) § 115.166(3)(B)	§ 115.166 § 115.166(1) § 115.166(1)(B) [G]§ 115.166(2) § 115.166(3) § 115.166(3)(B)	None
GRPLOAD	EU	R5211	VOC	30 TAC Chapter 115, Loading and Unloading of VOC	§ 115.217(a)(1) § 115.214(a)(1)(B) § 115.214(a)(1)(D) § 115.214(a)(1)(D)(i)	Vapor pressure (at land-based operations). All land-based loading and unloading of VOC with a true vapor pressure less than 0.5 psia is exempt from the requirements of this division, except as specified.	§ 115.214(a)(1)(A) § 115.214(a)(1)(A)(i) § 115.215 § 115.215(4)	§ 115.216 § 115.216(2) § 115.216(3)(B)	None
GRPTANK1	EU	R5112	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)	Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than 1.5 psia is exempt from the requirements of this division.	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(7)	None

### Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
GRPTANK2	EU	R5112	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)	Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than 1.5 psia is exempt from the requirements of this division.	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(7)	None
GRPTANK3	EU	R5112	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)	Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than 1.5 psia is exempt from the requirements of this division.	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(7)	None
GRPTANK4	EU	R5112	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)	Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than 1.5 psia is exempt from the requirements of this division.	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(6)(A) § 115.118(a)(7)	None
GRPTANK5	EU	R5112	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)	Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than 1.5 psia is exempt from the requirements of this division.	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(6)(A) § 115.118(a)(7)	None
GRP-VENT	EP	R5121	VOC	30 TAC Chapter 115, Vent Gas Controls	§ 115.122(a)(1) § 115.121(a)(1) § 115.122(a)(1)(B) § 60.18	Vent gas streams affected by §115.121(a)(1) must be controlled properly with a control efficiency of at least 90% or to a volatile organic compound (VOC) concentration of no more than 20 parts per million (ppmv) (on a dry basis	[G]§ 115.125 § 115.126(1) § 115.126(1)(B) § 115.126(2)	§ 115.126 § 115.126(1) § 115.126(1)(B) § 115.126(2)	None

### Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
						corrected to 3.0% oxygen for combustion devices).			
X-D-1	EU	R1111	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(4)(A)	Visible emissions from a process gas flare shall not be permitted for more than five minutes in any two-hour period, except for upset emissions as provided in §101.222(b).	§ 111.111(a)(4)(A)(i) § 111.111(a)(4)(A)(ii)	§ 111.111(a)(4)(A)(ii)	None
X-D-1	CD	60A	Opacity	40 CFR Part 60, Subpart A	§ 60.18(b) § 60.18(c)(1) § 60.18(c)(2) § 60.18(c)(3)(ii) § 60.18(c)(4)(i) § 60.18(c)(6) § 60.18(e)	Flares shall comply with paragraphs (c)-(f) of § 60.18.	§ 60.18(d) § 60.18(f)(1) § 60.18(f)(2) § 60.18(f)(3) § 60.18(f)(4)	None	None
X-E-1	EP	R5121	VOC	30 TAC Chapter 115, Vent Gas Controls	§ 115.122(a)(1) § 115.121(a)(1) § 115.122(a)(1)(B) § 60.18	Vent gas streams affected by §115.121(a)(1) must be controlled properly with a control efficiency of at least 90% or to a volatile organic compound (VOC) concentration of no more than 20 parts per million (ppmv) (on a dry basis corrected to 3.0% oxygen for combustion devices).	[G]§ 115.125 § 115.126(1) § 115.126(1)(B) § 115.126(2)	§ 115.126 § 115.126(1) § 115.126(1)(B) § 115.126(2)	None
X-E-2	EP	R5121	VOC	30 TAC Chapter 115, Vent Gas Controls	§ 115.127(a)(2)(A) [G]§ 115.122(a)(4) § 115.127(a)(2)	A vent gas stream having a combined weight of volatile organic compounds (VOC) < 100 lbs (45.4 kg) in any continuous 24-hour period is exempt from the requirements of § 115.121(a)(1).	[G]§ 115.125 § 115.126(2)	§ 115.126 § 115.126(2) § 115.126(4)	None
X-E-2	EP	R5121	VOC	30 TAC Chapter	§ 115.127(a)(2)(B)	A vent gas stream specified	[G]§ 115.125	§ 115.126	None

### Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
				115, Vent Gas Controls	[G]§ 115.122(a)(4) § 115.127(a)(2)	in § 115.121(a)(1) of this title with a concentration of VOC < 612 ppmv is exempt from § 115.121(a)(1).	§ 115.126(2)	§ 115.126(2) § 115.126(4)	
X-E-3	EP	R5121	VOC	30 TAC Chapter 115, Vent Gas Controls	§ 115.127(a)(2)(A) [G]§ 115.122(a)(4) § 115.127(a)(2)	A vent gas stream having a combined weight of volatile organic compounds (VOC) < 100 lbs (45.4 kg) in any continuous 24-hour period is exempt from the requirements of § 115.121(a)(1).	[G]§ 115.125 § 115.126(2)	§ 115.126 § 115.126(2) § 115.126(4)	None
X-E-3	EP	R5121	VOC	30 TAC Chapter 115, Vent Gas Controls	§ 115.127(a)(2)(B) [G]§ 115.122(a)(4) § 115.127(a)(2)	A vent gas stream specified in § 115.121(a)(1) of this title with a concentration of VOC < 612 ppmv is exempt from § 115.121(a)(1).	[G]§ 115.125 § 115.126(2)	§ 115.126 § 115.126(2) § 115.126(4)	None
X-E-4	EP	R5121-1	VOC	30 TAC Chapter 115, Vent Gas Controls	§ 115.127(a)(2)(A) [G]§ 115.122(a)(4) § 115.127(a)(2)	A vent gas stream having a combined weight of volatile organic compounds (VOC) equal to or less than 100 pounds in any continuous 24-hour period is exempt from §115.121(a)(1) of this title.	[G]§ 115.125 § 115.126(2)	§ 115.126 § 115.126(2) § 115.126(4)	None
X-E-4	EP	R5121-2	VOC	30 TAC Chapter 115, Vent Gas Controls	§ 115.127(a)(2)(B) [G]§ 115.122(a)(4) § 115.127(a)(2)	A vent gas stream specified in §115.121(a)(1) of this title with a concentration of VOC less than 612 parts per million by volume (ppmv) is exempt from §115.121(a)(1) of this title.	[G]§ 115.125 § 115.126(2)	§ 115.126 § 115.126(2) § 115.126(4)	None
X-G-34	EP	R1111	Opacity	30 TAC Chapter 111, Visible Emissions	§ 111.111(a)(1)(B) § 111.111(a)(1)(E)	Visible emissions from any stationary vent shall not exceed an opacity of 20% averaged over a six minute	[G]§ 111.111(a)(1)(F) ** See Periodic Monitoring	None	None

### Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
						period for any source on which construction was begun after January 31, 1972.	Summary		
X-I-12	EU	R5112	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)	Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than 1.5 psia is exempt from the requirements of this division.	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(6)(A) § 115.118(a)(7)	None
X-I-15	EU	R5112	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)	Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than 1.5 psia is exempt from the requirements of this division.	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(6)(A) § 115.118(a)(7)	None
X-I-16	EU	R5112	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)	Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than 1.5 psia is exempt from the requirements of this division.	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(6)(A) § 115.118(a)(7)	None
X-I-6	EU	R5112	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)	Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than 1.5 psia is exempt from the requirements of this division.	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(7)	None
X-I-7	EU	R5112	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)	Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(7)	None



### Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
						1.5 psia is exempt from the requirements of this division.			
X-J-11	EU	R5112	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)	Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than 1.5 psia is exempt from the requirements of this division.	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(7)	None
X-J-15	EU	R5112	VOC	30 TAC Chapter 115, Storage of VOCs	§ 115.111(a)(1)	Except as provided in § 115.118, a storage tank storing VOC with a true vapor pressure less than 1.5 psia is exempt from the requirements of this division.	[G]§ 115.117	§ 115.118(a)(1) § 115.118(a)(5) § 115.118(a)(6)(A) § 115.118(a)(7)	None
X-J-15	EU	60KB	VOC	40 CFR Part 60, Subpart Kb	§ 60.110b(a)	Except for §60.110b(b), this subpart applies to vessels with a capacity greater than or equal to 75 cubic meters (19,800 gal) used to store VOLs for which construction/reconstruction/modification began after 7/23/84.	§ 60.116b(a) § 60.116b(b) § 60.116b(c) § 60.116b(d) § 60.116b(e) § 60.116b(e)(1) [G]§ 60.116b(e)(3)	§ 60.116b(a) § 60.116b(b) § 60.116b(c)	§ 60.116b(d)

**Additional Monitoring Requirements**

**Periodic Monitoring Summary ..... 25**

### Periodic Monitoring Summary

Unit/Group/Process Information	
ID No.: X-G-34	
Control Device ID No.: PTS-1	Control Device Type: Other Control Device Type
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(B)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: once per calendar quarter	
Averaging Period: n/a	
<p>Deviation Limit: There shall be no visible emissions. If visible emissions are observed, the permit holder shall either report a deviation or perform Test Method 9 and opacity shall not exceed 20 %.</p> <p>Periodic Monitoring Text: Visible emissions observations shall be made and recorded. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 miles, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor.</p> <p>If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If the result of the Test Method 9 is opacity above the opacity limit in the applicable requirement, the permit holder shall report a deviation.</p>	

**Permit Shield**

**Permit Shield ..... 27**

### Permit Shield

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit/Group/Process		Regulation	Basis of Determination
ID No.	Group/Inclusive Units		
GAS1	N/A	30 TAC Chapter 115, Storage of VOCs	Storage tank has storage capacity less than 1,000 gallons.
GAS1	N/A	40 CFR Part 60, Subpart Kb	Storage vessel capacity is less than 75 m3 (19,800 gallons).
GAS2	N/A	30 TAC Chapter 115, Storage of VOCs	Storage tank has storage capacity less than 1,000 gallons.
GAS2	N/A	40 CFR Part 60, Subpart Kb	Storage vessel capacity is less than 75 m3 (19,800 gallons).
GRPTANK1	TOTE1, TOTE2, TOTE3, TOTE4, X-G-13, X-G-14, X-G-15, X-G-17, X-G-18, X-G-32, X-H-3, X-H-6, X-H-7, X-H-8, X-I-5, X-I-9, X-PD-4	40 CFR Part 60, Subpart Kb	Storage vessel capacity is less than 75 m3 (19,800 gallons).
GRPTANK2	X-G-29, X-G-4, X-I-14, X-J-18, X-J-19, X-J-31, X-J-32	40 CFR Part 60, Subpart Kb	Storage vessel capacity is less than 75 m3 (19,800 gallons).
GRPTANK3	X-G-11, X-I-13	40 CFR Part 60, Subpart Kb	Storage vessel capacity is greater than 75 m3 (19,800 gallons) but less than 151 m3 (39,900 gallons) and the maximum true vapor pressure is less than 15.0 kPa (2.2 psia).
GRPTANK4	X-G-19, X-G-3, X-G-5, X-G-6, X-H-1, X-H-13, X-H-14, X-H-2, X-I-0, X-I-1, X-I-2, X-J-24, X-J-25, X-J-26	40 CFR Part 60, Subpart Kb	Storage vessel capacity is greater than 75 m3 (19,800 gallons) but less than 151 m3 (39,900 gallons) and the maximum true vapor pressure is less than 15.0 kPa (2.2 psia).
GRPTANK5	X-G-0, X-G-1, X-G-12, X-G-16, X-G-20, X-G-21, X-G-22, X-G-23, X-G-24, X-G-25, X-G-26, X-	40 CFR Part 60, Subpart Kb	Storage vessel capacity is greater than 151 m3 (39,900 gallons) and maximum true vapor pressure is less than 3.5 kPa (0.5 psia).

### Permit Shield

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit/Group/Process		Regulation	Basis of Determination
ID No.	Group/Inclusive Units		
	G-28, X-G-31, X-G-36, X-G-7, X-G-8, X-G-9, X-H-0, X-H-11, X-H-12, X-H-16, X-H-17, X-H-18, X-H-4, X-H-5, X-H-9, X-I-8, X-J-1, X-J-10, X-J-12, X-J-13, X-J-14, X-J-16, X-J-17, X-J-2, X-J-20, X-J-27, X-J-28, X-J-29, X-J-3, X-J-30, X-J-4, X-J-5, X-J-6, X-J-8, X-J-9		
GRPTANK6	X-J-22, X-WT-4, X-WT-5, X-WT-7	30 TAC Chapter 115, Storage of VOCs	Storage tank has storage capacity less than 1,000 gallons.
GRPTANK6	X-J-22, X-WT-4, X-WT-5, X-WT-7	40 CFR Part 60, Subpart Kb	Storage vessel capacity is less than 75 m3 (19,800 gallons).
X-B-1	N/A	30 TAC Chapter 115, HRVOC Cooling Towers	Cooling tower does not emit HRVOC.
X-B-1	N/A	40 CFR Part 63, Subpart Q	Process cooling tower does not operate with chromium-based water treatment chemicals after 09/08/1994.
X-C-1	N/A	30 TAC Chapter 117, Subchapter B	Process heater is not located at a major stationary source of NOx.
X-D-1	N/A	30 TAC Chapter 117, Subchapter B	Flare is not located at a major stationary source of NOx.
X-GZ-0	N/A	30 TAC Chapter 115, Pet. Refinery & Petrochemicals	Operation is not a petroleum refinery, a synthetic organic chemical, polymer, resin or methyl-tert-butyl ether manufacturing process, or a natural gas/gasoline processing operation.

### Permit Shield

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit/Group/Process		Regulation	Basis of Determination
ID No.	Group/Inclusive Units		
X-I-12	N/A	40 CFR Part 60, Subpart Kb	Storage vessel capacity is greater than 75 m3 (19,800 gallons) but less than 151 m3 (39,900 gallons) and the maximum true vapor pressure is less than 15.0 kPa (2.2 psia).
X-I-15	N/A	40 CFR Part 60, Subpart Kb	Storage vessel capacity is greater than 151 m3 (39,900 gallons) and maximum true vapor pressure is less than 3.5 kPa (0.5 psia).
X-I-16	N/A	40 CFR Part 60, Subpart Kb	Storage vessel capacity is greater than 151 m3 (39,900 gallons) and maximum true vapor pressure is less than 3.5 kPa (0.5 psia).
X-I-6	N/A	40 CFR Part 60, Subpart Kb	Storage vessel capacity is less than 75 m3 (19,800 gallons).
X-I-7	N/A	40 CFR Part 60, Subpart Kb	Storage vessel capacity is greater than 75 m3 (19,800 gallons) but less than 151 m3 (39,900 gallons) and the maximum true vapor pressure is less than 15.0 kPa (2.2 psia).
X-J-11	N/A	40 CFR Part 60, Subpart Kb	Storage vessel capacity is less than 75 m3 (19,800 gallons).

**New Source Review Authorization References**

<b>New Source Review Authorization References .....</b>	<b>31</b>
<b>New Source Review Authorization References by Emission Unit .....</b>	<b>32</b>



### New Source Review Authorization References

The New Source Review authorizations listed in the table below are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 18161	Issuance Date: 09/26/2017
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.262	Version No./Date: 11/01/2003
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.264	Version No./Date: 09/04/2000
Number: 106.265	Version No./Date: 09/04/2000
Number: 106.433	Version No./Date: 09/04/2000
Number: 106.452	Version No./Date: 09/04/2000
Number: 106.454	Version No./Date: 11/01/2001
Number: 106.472	Version No./Date: 09/04/2000
Number: 106.473	Version No./Date: 09/04/2000
Number: 106.511	Version No./Date: 09/04/2000
Number: 106.532	Version No./Date: 09/04/2000

### New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization
ADDITPLANT	ADDITIONAL PLANT PROCESS REQUIREMENTS	18161
C-1401	PROCESS VESSEL VENT	18161
C-1407	PROCESS VESSEL VENT	18161
C-1423	PROCESS VESSEL VENT	18161
C-1424	PROCESS VESSEL VENT	18161
C-1602	PROCESS VESSEL VENT	18161
D-1150	PROCESS VESSEL VENT	18161
D-1212	PROCESS VESSEL VENT	18161
D-1420	PROCESS VESSEL VENT	18161
D-1613	PROCESS VESSEL VENT	18161
D-1624	PROCESS VESSEL VENT	18161
D-1625	PROCESS VESSEL VENT	18161
GAS1	GASOLINE TANK	106.473/09/04/2000
GAS2	GASOLINE TANK	106.473/09/04/2000
R-1112	PROCESS VESSEL VENT	18161
R-1120	PROCESS VESSEL VENT	18161
R-1150	PROCESS VESSEL VENT	18161
R-1210	PROCESS VESSEL VENT	18161
R-1214	PROCESS VESSEL VENT	18161
R-1228	PROCESS VESSEL VENT	18161
TOTE1	TOTE TO-1362	106.472/09/04/2000

### New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization
TOTE2	TOTE TO-1363	106.472/09/04/2000
TOTE3	TOTE TO-1364	106.472/09/04/2000
TOTE4	TOTE TO-1365	106.472/09/04/2000
X-A-0	LOAD SPOT 26	18161, 106.261/11/01/2003, 106.262/11/01/2003, 106.472/09/04/2000
X-A-10	LOAD SPOT 36	18161
X-A-11	LOAD SPOT 37	18161
X-A-12	LOAD SPOT 32	18161, 106.261/11/01/2003, 106.262/11/01/2003, 106.472/09/04/2000
X-A-13	LOAD SPOT 43	18161
X-A-14	LOAD SPOT 44	18161
X-A-15	LOAD SPOT 51	18161
X-A-16	LOAD SPOT 59	18161, 106.472/09/04/2000
X-A-17	LOAD SPOT 40	18161
X-A-18	LOAD SPOT 54	18161
X-A-19	LOAD SPOT 56	18161
X-A-1	LOAD SPOT 27	18161, 106.261/11/01/2003, 106.262/11/01/2003, 106.472/09/04/2000
X-A-20	LOAD SPOT 29	18161
X-A-25	LOAD SPOT 25	106.261/11/01/2003, 106.262/11/01/2003, 106.472/09/04/2000
X-A-2	LOAD SPOT 34	18161, 106.472/09/04/2000

### New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization
X-A-4	LOAD SPOT 45	18161
X-A-5	LOAD SPOT 33	18161
X-A-6	LOAD SPOT 57	18161
X-A-7	LOAD SPOT 58	18161
X-A-8	LOAD SPOT 70	18161
X-A-9	LOAD SPOT 35	18161
X-B-1	COOLING TOWER Y-1601A	18161
X-C-1	HOT OIL FURNACE E-1614	18161
X-D-1	FLARE	18161, 106.261/11/01/2003, 106.262/11/01/2003
X-E-1	SCRUBBER C-1120	18161, 106.261/11/01/2003, 106.262/11/01/2003
X-E-2	SCRUBBER C-1130	18161, 106.261/11/01/2003, 106.262/11/01/2003
X-E-3	SCRUBBER C-1429	18161
X-E-4	SCRUBBER C-1138	106.261/11/01/2003, 106.262/11/01/2003
X-G-0	TANK T-1103	18161, 106.261/11/01/2003, 106.262/11/01/2003
X-G-11	TANK T-1102	18161
X-G-12	TANK T-1301	18161, 106.261/11/01/2003, 106.262/11/01/2003
X-G-13	TANK T-1311A	18161, 106.261/11/01/2003, 106.262/11/01/2003
X-G-14	TANK T-1311B	18161, 106.261/11/01/2003, 106.262/11/01/2003
X-G-15	TANK T-1311C	18161
X-G-16	TANK T-1305	18161
X-G-17	TANK T-1311D	18161

### New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization
X-G-18	TANK T-1314	18161
X-G-19	TANK T-1317	18161, 106.261/11/01/2003, 106.262/11/01/2003
X-G-1	TANK T-1105	18161
X-G-20	TANK T-1309	18161
X-G-21	TANK T-1310	18161, 106.261/11/01/2003, 106.262/11/01/2003
X-G-22	TANK T-1334	18161
X-G-23	TANK T-1335	18161
X-G-24	TANK T-1315	18161
X-G-25	TANK T-1316	18161
X-G-26	TANK T-1336	18161, 106.261/11/01/2003, 106.262/11/01/2003
X-G-28	TANK T-1154	18161
X-G-29	TANK T-1171	18161
X-G-31	TANK T-1354	18161
X-G-32	TANK T-1390	18161
X-G-34	POWDER HANDLING SYSTEM (PTS-1)	106.261/11/01/2003
X-G-36	TANK T-1471	18161
X-G-3	TANK T-1162A	18161
X-G-4	TANK T-1161	18161
X-G-5	TANK T-1160	18161
X-G-6	TANK T-1162B	18161
X-G-7	TANK T-1322	18161

### New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization
X-G-8	TANK T-1313	18161, 106.261/11/01/2003, 106.262/11/01/2003
X-G-9	TANK T-1380	18161
X-GZ-0	PROCESS AREA FUGITIVES	18161, 106.261/11/01/2003, 106.262/11/01/2003
X-H-0	TANK T-1341	18161, 106.261/11/01/2003, 106.262/11/01/2003
X-H-11	TANK T-1325	18161
X-H-12	TANK T-1326	18161
X-H-13	TANK T-1358	18161, 106.261/11/01/2003, 106.262/11/01/2003, 106.472/09/04/2000
X-H-14	TANK T-1359	18161, 106.261/11/01/2003, 106.262/11/01/2003, 106.472/09/04/2000
X-H-16	TANK T-1355	18161
X-H-17	TANK T-1356	18161
X-H-18	TANK T-1357	18161
X-H-1	TANK T-1343	18161, 106.261/11/01/2003, 106.262/11/01/2003
X-H-2	TANK T-1345	18161, 106.261/11/01/2003, 106.262/11/01/2003
X-H-3	TANK T-1346	18161, 106.261/11/01/2003, 106.262/11/01/2003
X-H-4	TANK T-1330A	18161, 106.261/11/01/2003, 106.262/11/01/2003
X-H-5	TANK T-1330B	18161, 106.261/11/01/2003, 106.262/11/01/2003
X-H-6	TANK T-1321	18161, 106.261/11/01/2003, 106.262/11/01/2003
X-H-7	TANK T-1349	18161, 106.261/11/01/2003, 106.262/11/01/2003, 106.472/09/04/2000
X-H-8	TANK T-1347	18161

### New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization
X-H-9	TANK T-1312	18161
X-I-0	TANK T-1360A	18161, 106.261/11/01/2003, 106.262/11/01/2003, 106.472/09/04/2000
X-I-12	TANK D-1610B	18161
X-I-13	TANK T-1601	18161
X-I-14	TANK-T-1606	18161
X-I-15	TANK T-1612	18161
X-I-16	TANK T-1628	18161, 106.261/11/01/2003, 106.262/11/01/2003
X-I-1	TANK T-1360B	18161, 106.261/11/01/2003, 106.262/11/01/2003, 106.472/09/04/2000
X-I-2	TANK T-1360C	18161, 106.261/11/01/2003, 106.262/11/01/2003, 106.472/09/04/2000
X-I-5	TANK T-1140	18161
X-I-6	PRESS TANK D-1604	18161
X-I-7	TANK T-1603	18161
X-I-8	TANK T-1340	18161, 106.261/11/01/2003, 106.262/11/01/2003
X-I-9	TANK D-1126	18161
X-J-10	TANK T-1412	18161
X-J-11	TANK T-1413	18161
X-J-12	TANK T-1414	18161
X-J-13	TANK T-1416	18161
X-J-14	TANK T-1417	18161

### New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization
X-J-15	TANK T-1203	18161
X-J-16	TANK T-1204	18161
X-J-17	TANK T-1251	18161
X-J-18	TANK T-1215A	18161
X-J-19	TANK T-1216A	18161
X-J-1	TANK T-1401	18161
X-J-20	TANK T-1217	18161
X-J-22	TANK D-1242	18161
X-J-24	TANK T-1222	18161
X-J-25	TANK T-1223	18161
X-J-26	TANK T-1224	18161
X-J-27	TANK T-1225	18161
X-J-28	TANK T-1226	18161
X-J-29	TANK T-1227	18161
X-J-2	TANK T-1402	18161
X-J-30	TANK T-1231	18161
X-J-31	TANK T-1211	18161
X-J-32	TANK T-1212	18161
X-J-3	TANK T-1415	18161
X-J-4	TANK T-1404	18161
X-J-5	TANK T-1405	18161



### **New Source Review Authorization References by Emissions Unit**

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

<b>Unit/Group/Process ID No.</b>	<b>Emission Unit Name/Description</b>	<b>New Source Review Authorization</b>
X-J-6	TANK T-1445	18161
X-J-8	TANK T-1409	18161
X-J-9	TANK T-1411	18161
X-PD-4	TANK D-1124	18161
X-WT-4	TANK T-1604	18161
X-WT-5	TANK T-1605	18161
X-WT-7	TANK T-1607	18161

## **Schedules**

<b>Compliance Schedule .....</b>	<b>41</b>
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## Compliance Schedule

<b>A. Compliance Schedule</b>				
<b>1. Specific Non-Compliance Situation</b>				
Unit/Group/ Process ID. No(s).	SOP Index No.	Pollutant	Applicable Requirement	
			Citation	Text Description
Sitewide		VOC	NSR 18161 SC24	The site must comply with production rates listed in the permit application.
<b>2. Compliance Status Assessment Method and Records Location</b>				
Compliance Status Assessment Method			Location of Records/Documentation	
Citation	Text Description			
NSR 18161 SC24	August 2018 NSR Renewal Application		Unit environmental files onsite	
<b>3. Non-compliance Situation Description</b>				
Permit application representations, including fugitive emission component counts, Table 1-1 and Table 2 were not easily reconciled. Reported under Texas Audit Privilege Act on April 27, 2018.				
<b>4. Corrective Action Plan Description</b>				
Update NSR permit tables and representations for current operations.				
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>				
1	Evaluate current operations production and input throughputs. (2Q2018) - COMPLETE			
2	Submit an application to revise the NSR permit 18161 representations. (3Q2018)			
3	TCEQ issues updated NSR Permit 18161 (TBD - based on TCEQ timeline).			
4	Afton Chemical Corporation will respond to timely inquiries within the time limit stipulated by the APD permit reviewer.			
6. Previously Submitted Compliance Plan(s)		Type of Action		Date Submitted
		N/A		
<b>7. Progress Report Submission Schedule</b>		Semi-annually in conjunction with the deviation reports.		

## Compliance Schedule

<b>A. Compliance Schedule</b>				
<b>1. Specific Non-Compliance Situation</b>				
Unit/Group/ Process ID. No(s).	SOP Index No.	Pollutant	Applicable Requirement	
			Citation	Text Description
Sitewide		VOC	§116.110(a)(1)	Any new or modified facilities must obtain a NSR authorization.
<b>2. Compliance Status Assessment Method and Records Location</b>				
Compliance Status Assessment Method			Location of Records/Documentation	
Citation	Text Description			
§116.110(a)(1)	Environmental permitting files.		Unit environmental files onsite	
<b>3. Non-compliance Situation Description</b>				
Miscellaneous sources were found not to have NSR authorization, as reported under the Texas Audit Privilege Act on April 27, 2018.				
<b>4. Corrective Action Plan Description</b>				
Obtain NSR Authorization for the miscellaneous sources without authorization.				
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>				
1	Identify all sources without NSR authorization. (3Q2018) - COMPLETE			
2	Submit an application to revise the NSR permit representations. (4Q2018) - COMPLETE (Submitted 10/24/2018)			
3	TCEQ issues Registration updated NSR Permit 18161 (TBD - based on TCEQ timeline).			
4	Afton Chemical Corporation will respond to timely inquiries within the time limit stipulated by the APD permit reviewer.			
6. Previously Submitted Compliance Plan(s)		Type of Action	Date Submitted	
		N/A		
<b>7. Progress Report Submission Schedule</b>		Semi-annually in conjunction with the deviation reports.		

## Compliance Schedule

<b>A. Compliance Schedule</b>				
<b>1. Specific Non-Compliance Situation</b>				
Unit/Group/ Process ID. No(s).	SOP Index No.	Pollutant	Applicable Requirement	
			Citation	Text Description
Sitewide		VOC, NOx, CO, SO2, PM	§116.115(b)(2)(E)	Maintain records containing the information and data sufficient to demonstrate compliance with the permit.
<b>2. Compliance Status Assessment Method and Records Location</b>				
Compliance Status Assessment Method			Location of Records/Documentation	
Citation	Text Description			
§116.115(b)(2)(E)	Environmental permitting files.		Unit environmental files onsite	
<b>3. Non-compliance Situation Description</b>				
No established system is available to facilitate assessing emission limits on a 12-month rolling period, as reported under the Texas Audit Privilege Act on April 27, 2018.				
<b>4. Corrective Action Plan Description</b>				
Establish an emissions tracking system to estimate rolling 12-month emissions.				
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>				
1	Evaluate systems to estimate 12-month rolling emissions for all sources in NSR 18161 (2Q2018)			
2	Develop permit basis calculations for each NSR 18161 source by 09/30/2018.			
3	Populate emission calculation system with calculation methodologies and material data by 06/30/2019.			
4	Afton Chemical Corporation will respond to timely inquiries within the time limit stipulated by the APD permit reviewer.			
6. Previously Submitted Compliance Plan(s)		Type of Action	Date Submitted	
		N/A		
7. Progress Report Submission Schedule		Semi-annually in conjunction with the deviation reports.		

## Compliance Schedule

<b>A. Compliance Schedule</b>				
<b>1. Specific Non-Compliance Situation</b>				
Unit/Group/ Process ID. No(s).	SOP Index No.	Pollutant	Applicable Requirement	
			Citation	Text Description
Sitewide		VOC	NSR 18161 MAERT	Permit representations and emission calculations must be aligned with current APD guidance.
<b>2. Compliance Status Assessment Method and Records Location</b>				
Compliance Status Assessment Method			Location of Records/Documentation	
Citation	Text Description			
NSR 18161 MAERT	Environmental permitting files.		Unit environmental files onsite	
<b>3. Non-compliance Situation Description</b>				
Short-term (hourly) emissions rates from fixed roof tanks were not addressed following TCEQ guidance in the most recent renewal of Permit 18616, as reported under the Texas Audit Privilege Act on August 16, 2018.				
<b>4. Corrective Action Plan Description</b>				
Submit NSR permit application reflecting the use of the correct TCEQ guidance (ADPG 6250) for hourly emissions.				
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>				
1	Submit an application to revise the NSR permit representations. COMPLETE (Submitted 7/31/18)			
2	TCEQ issues updated NSR Permit 18161 (TBD - based on TCEQ timeline).			
3	Afton Chemical Corporation will respond to timely inquiries within the time limit stipulated by the APD permit reviewer.			
6. Previously Submitted Compliance Plan(s)		Type of Action		Date Submitted
		N/A		
7. Progress Report Submission Schedule		Semi-annually in conjunction with the deviation reports.		

## Compliance Schedule

<b>A. Compliance Schedule</b>				
<b>1. Specific Non-Compliance Situation</b>				
Unit/Group/ Process ID. No(s).	SOP Index No.	Pollutant	Applicable Requirement	
			Citation	Text Description
X-GZ-0		BF3 and HF	NSR 18161 SC4	BF3 handling and control procedures
<b>2. Compliance Status Assessment Method and Records Location</b>				
Compliance Status Assessment Method			Location of Records/Documentation	
Citation	Text Description			
NSR 18161 SC4	September 2017 Amendment		Unit environmental files onsite	
<b>3. Non-compliance Situation Description</b>				
The 1993 procedures referred to in Special Condition 4 of Permit 18161 for Boron Trifluoride and Hydrogen Fluoride were subsequently updated.				
<b>4. Corrective Action Plan Description</b>				
Afton submitted a permit amendment on July 31, 2018, and an update to the special condition will be proposed. This was reported under the Texas Audit Privilege Act on October 26, 2018.				
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>				
1	Afton proposes updated language for SC4 and submits permit revision for NSR Permit 18161.			
2	TCEQ issues revised NSR Permit 18161.			
3	Afton Chemical Corporation will respond to timely inquiries within the time limit stipulated by the APD permit reviewer.			
6. Previously Submitted Compliance Plan(s)		Type of Action		Date Submitted
		N/A		
<b>7. Progress Report Submission Schedule</b>		Semi-annually in conjunction with the deviation reports		

## Compliance Schedule

<b>A. Compliance Schedule</b>				
<b>1. Specific Non-Compliance Situation</b>				
Unit/Group/ Process ID. No(s).	SOP Index No.	Pollutant	Applicable Requirement	
			Citation	Text Description
GRPTANK1, GRPTANK2, GRPTANK3, GRPTANK4, GRPTANK5		VOC	NSR 18161 SC8. A.	Tank configuration and operation
<b>2. Compliance Status Assessment Method and Records Location</b>				
Compliance Status Assessment Method			Location of Records/Documentation	
Citation	Text Description			
NSR 18161 SC8. A.	September 2017 Amendment		Unit environmental files onsite	
<b>3. Non-compliance Situation Description</b>				
Special Condition 8.A. of Permit 18161 refers to Attachment 'A' of the permit requiring submerged fill pipe for tanks. Some tanks were not changed from the existing fill configuration. This was reported under the Texas Audit Privilege Act on October 26, 2018.				
<b>4. Corrective Action Plan Description</b>				
Afton submitted a permit amendment on July 31, 2018. Configuration will be evaluated during the permit amendment application by the TCEQ, and the permit reference or configuration will be revised as applicable.				
<b>5. List of Activities/Milestones to Implement the Corrective Action Plan</b>				
1	Afton proposes updated language for SC8. A.			
2	TCEQ issues revised NSR Permit 18161.			
3	Afton Chemical Corporation will respond to timely inquiries within the time limit stipulated by the APD permit reviewer.			
6. Previously Submitted Compliance Plan(s)		Type of Action		Date Submitted
N/A				
7. Progress Report Submission Schedule		Semi-annually in conjunction with the deviation reports		



**Appendix A**

**Acronym List ..... 48**

## Acronym List

The following abbreviations or acronyms may be used in this permit:

ACFM .....	actual cubic feet per minute
AMOC .....	alternate means of control
ARP .....	Acid Rain Program
ASTM .....	American Society of Testing and Materials
B/PA .....	Beaumont/Port Arthur (nonattainment area)
CAM .....	Compliance Assurance Monitoring
CD .....	control device
CEMS .....	continuous emissions monitoring system
CFR .....	Code of Federal Regulations
COMS .....	continuous opacity monitoring system
CVS .....	closed vent system
D/FW .....	Dallas/Fort Worth (nonattainment area)
EP .....	emission point
EPA .....	U.S. Environmental Protection Agency
EU .....	emission unit
FCAA Amendments .....	Federal Clean Air Act Amendments
FOP .....	federal operating permit
gr/100 scf .....	grains per 100 standard cubic feet
HAP .....	hazardous air pollutant
H/G/B .....	Houston/Galveston/Brazoria (nonattainment area)
H <sub>2</sub> S .....	hydrogen sulfide
ID No. ....	identification number
lb/hr .....	pound(s) per hour
MACT .....	Maximum Achievable Control Technology (40 CFR Part 63)
MMBtu/hr .....	Million British thermal units per hour
NA .....	nonattainment
N/A .....	not applicable
NADB .....	National Allowance Data Base
NESHAP .....	National Emission Standards for Hazardous Air Pollutants (40 CFR Part 61)
NO <sub>x</sub> .....	nitrogen oxides
NSPS .....	New Source Performance Standard (40 CFR Part 60)
NSR .....	New Source Review
ORIS .....	Office of Regulatory Information Systems
Pb .....	lead
PBR .....	Permit By Rule
PEMS .....	predictive emissions monitoring system
PM .....	particulate matter
ppmv .....	parts per million by volume
PRO .....	process unit
PSD .....	prevention of significant deterioration
psia .....	pounds per square inch absolute
SIP .....	state implementation plan
SO <sub>2</sub> .....	sulfur dioxide
TCEQ .....	Texas Commission on Environmental Quality
TSP .....	total suspended particulate
TVP .....	true vapor pressure
U.S.C. ....	United States Code
VOC .....	volatile organic compound